

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

In re

**GEOSTELLAR, INC.,
Debtor(s).**

**Bankruptcy Case No. 18-00045
Chapter 7**

**MARTIN P. SHEEHAN, TRUSTEE,
Plaintiff,**

v.

Adversary Proceeding No. 19-00024

**DAVID ANDREW LEVINE and
INDECO UNION,
Defendant(s).**

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 2091-1 of the United States Bankruptcy Court for the Northern District of West Virginia Local Rules, counsel for Defendant Indeco Union (“Indeco”) submits this Motion to Withdraw as Counsel, and for the following reasons requests that the Court enter the accompanying proposed order being submitted herewith:

1. Dunlap Bennett & Ludwig PLLC, including its counsel, Cortland C. Putbreshe (collectively, “DBL”), appeared in this action as counsel for the Defendant, Indeco.
2. Martin P. Sheehan, Trustee for David A. Levine (“Mr. Levine”) in Mr. Levine’s personal bankruptcy action pending before this Court, has taken over operations of Indeco. (*See* Case No. 3:19-bk-01048, Dkt. 169.) Mr. Sheehan has chosen not to retain DBL to represent Indeco in connection to this action.
3. DBL has provided Indeco, by way of Mr. Sheehan, with all requisite information and notice of withdrawal as required by Rule 2091-1(b)(2) prior to filing the instant Motion.
4. As mentioned, this Motion is accompanied by a proposed written order.

5. Upon entry of this proposed written order, Dunlap Bennett & Ludwig PLLC, including its counsel, Cortland C. Putbrese, shall be deemed immediately withdrawn as Indeco's counsel in the above-captioned action and shall have no further obligation whatsoever to appear or represent Indeco in this action.

Dated: January 11, 2021.

Respectfully submitted,

/s/Cortland C. Putbrese
Cortland C. Putbrese (WVSB No. 7780)
Dunlap Bennett & Ludwig PLLC
8003 Franklin Farms Dr., Suite 220
Richmond, Virginia 23229
Tel: (804) 977-2688
Fax: (804) 977-2680
Email: cputbrese@dbllawyers.com

CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of January 2021, I filed a copy of the foregoing Motion to Withdraw as Counsel electronically using the West Virginia E-Filing System, which will send notice of the filing to counsel for the parties to this action. Moreover, a true and accurate copy was served via email upon the following:

Debra A. Wertman, Esq.
Assistant United States Trustee
300 Virginia Street, East
Room 2025
Charleston, West Virginia 25301
(via electronic mail)

Martin P. Sheehan, *Trustee*
Sheehan & Associates, PLLC
41 - 15th Street
Wheeling, WV 26003
(via electronic mail)

Patrick S Cassidy, Esq.
Cassidy, Cogan, Shapell & Voegelin, L. C.
The First State Capitol
1413 Eoff St
Wheeling, WV 26003
(via electronic mail)

Timothy Francis Cogan, Esq.
Cassidy, Cogan, Shapell & Voegelin, L. C.
The First State Capitol
1413 Eoff Street
Wheeling, WV 26003
(via electronic mail)

/s/Cortland C. Putbrese
Cortland C. Putbrese, Esq.